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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-4 TIMOTHY IVORY CARPENTER,
a/k/a "Little Tim,"
D-10 SEDRIC CHARLES BELL-GILL,
a/k/a "Sed,"
D-11 TIMOTHY MICHAEL SANDERS,
a/k/a "Big Tim,"
D-12 PATRICK HEARD,

Defendants.

CRIMINAL NO. 12-20218

HON. LAWRENCE P. ZATKOFF

VIOLATION: 18 U.S.C. § 1951
18 U.S.C. § 924(c)

FILED
2013 JUN 18 P 4:22
U.S. DIST. COURT CLERK
EAST DIST. MICH.
DETROIT

FOURTH SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

**COUNT ONE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER

On or about December 13, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as "Little Tim," defendant herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant's robbery of Radio Shack located at 13330

E. Jefferson Avenue in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER

On or about December 13, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count One of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER
D-10 SEDRIC CHARLES BELL-GILL

On or about December 18, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and SEDRIC CHARLES BELL-GILL, also known as “Sed,” defendants herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendants’ robbery of T-Mobile located at 14304 Gratiot in Detroit,

Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT FOUR: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER
D-10 SEDRIC CHARLES BELL-GILL

On or about December 18, 2010, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and SEDRIC CHARLES BELL-GILL, also known as “Sed,” defendants herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Three of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIVE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-11 TIMOTHY MICHAEL SANDERS

On or about January 7, 2011, within the Eastern District of Michigan, Southern Division, TIMOTHY MICHAEL SANDERS, also known as “Big Tim,” defendant herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant’s robbery of T-Mobile located at 5843 W. Vernor in Detroit, Michigan, and thereby obstructed, delayed and affected interstate

commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT SIX: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-11 TIMOTHY MICHAEL SANDERS

On or about January 7, 2011, within the Eastern District of Michigan, Southern Division, TIMOTHY MICHAEL SANDERS, also known as “Big Tim,” defendant herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Five of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SEVEN: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER
D-11 TIMOTHY MICHAEL SANDERS

On or about March 4, 2011, within the Eastern District of Michigan, Southern Division, and elsewhere, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and TIMOTHY MICHAEL SANDERS, also known as “Big Tim,” defendants herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendants’ robbery of Radio Shack located at 2553 Parkman Road in Warren, Ohio, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT EIGHT: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER
D-11 TIMOTHY MICHAEL SANDERS

On or about March 4, 2011, within the Eastern District of Michigan, Southern Division, and elsewhere, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and TIMOTHY MICHAEL SANDERS, also known as “Big Tim,” defendants herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Seven of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT NINE: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER

On or about April 5, 2011, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant’s robbery of Radio Shack located at 14501 Woodward Avenue in Highland Park, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT TEN: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER

On or about April 5, 2011, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” defendant herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Nine of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT ELEVEN: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER
D-10 SEDRIC CHARLES BELL-GILL

On or about October 31, 2012, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and SEDRIC CHARLES BELL-GILL, also known as “Sed,” defendants herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendants’ robbery of T-Mobile located at 3151 Jefferson Avenue in Detroit, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWELVE: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER
D-10 SEDRIC CHARLES BELL-GILL

On or about October 31, 2012, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and SEDRIC CHARLES BELL-GILL, also known as “Sed,” defendants herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Eleven of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THIRTEEN: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-4 TIMOTHY IVORY CARPENTER
D-12 PATRICK HEARD

On or about December 1, 2012, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and PATRICK HEARD, defendants herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendants’ robbery of Radio Shack located at 15005 E. 8 Mile Road in Eastpointe, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT FOURTEEN: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-4 TIMOTHY IVORY CARPENTER
D-12 PATRICK HEARD

On or about December 1, 2012, within the Eastern District of Michigan, Southern Division, TIMOTHY IVORY CARPENTER, also known as “Little Tim,” and PATRICK HEARD, defendants herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Thirteen of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIFTEEN: (Robbery Affecting Interstate
Commerce – 18 U.S.C. § 1951)**

D-12 PATRICK HEARD

On or about January 26, 2013, within the Eastern District of Michigan, Southern Division, PATRICK HEARD, defendant herein, knowingly and unlawfully took, and aided and abetted others in taking, personal property from the person or presence of another through actual and threatened force and violence and by causing the victims to have a fear of immediate injury to their person during defendant’s robbery of AT&T located at 11526 E. 10 Mile Road in Warren, Michigan, and thereby obstructed, delayed and affected interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

**COUNT SIXTEEN: (Using or Carrying a Firearm During
a Federal Crime of Violence – 18 U.S.C. § 924(c))**

D-12 PATRICK HEARD

On or about January 26, 2013, within the Eastern District of Michigan, Southern Division, PATRICK HEARD, defendant herein, knowingly used and carried, and aided and abetted others in using and carrying, a firearm during and in relation to the robbery charged in Count Fifteen of this Indictment, during which a firearm was brandished, all in violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL.

/s Grand Jury Foreperson

Dated: 6/18/13

BARBARA L. MCQUADE
United States Attorney

s/ John N. O'Brien II (P39912)
Chief, Violent Organized Crime Unit

s/ Kenneth R. Chadwell (P39121)
Assistant United States Attorney

| | | |
|--|----------------------------------|-------------------------|
| United States District Court Eastern District of Michigan | Criminal Case Cover Sheet | Case Number 12-20218 |
|--|----------------------------------|-------------------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

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|--|-----------------------------|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | AUSA's Initials: <i>KRC</i> |

Case Title: USA v. TIMOTHY IVORY CARPENTER. ET. AL.,

County where offense occurred : WAYNE AND MACOMB COUNTY

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]
☒ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information


Superseding to Case No: 12-20218 Judge: Lawrence P. Zatkoff

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

| <u>Defendant name</u> | <u>Charges</u> | <u>Prior Complaint (if applicable)</u> |
|-------------------------------|--------------------------|--|
| D-10 Sedric Charles Bell-Gill | 18 U.S.C. §§1951, 924(c) | |
| D-11 Timothy Michael Sanders | 18 U.S.C. §§1951, 924(c) | |
| D-12 Patrick Heard | 18 U.S.C. §§1951, 924(c) | |

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

June 18, 2013
Date


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 Attorney Bar #: (P39121)

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.